

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

CHERYL A. MORENA

Debtor

Case No. 5-16-00147

Chapter 13

Robert N. Opel, II, B.J.

CHARLES J. DEHART, III, Chapter 13
Trustee

Movant

v.

CHERYL A. MORENA

Respondent

DEBTOR'S OBJECTION TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS

AND NOW, comes the above captioned Debtor and files the following Objection to the Motion of the Chapter 13 Trustee to Dismiss:

1. Debtor objects to the dismissal of her case and will file an Amended Plan prior to the hearing on the Trustee's Motion.

WHEREFORE, the Debtor respectfully requests that this Court enter an order denying the Trustee's Motion and granting the Debtor such other and further relief as the Court deems just and appropriate under the circumstances.

Respectfully Submitted
Law Offices of Brian E. Manning
/s/ Brian E. Manning
Brian E. Manning, Esquire
502 S. Blakely, St., Suite B
Dunmore, PA 18512
Tel. 570-558-1126
Fax 866-559-9808
brianemanning@comcast.net
Attorney for the Debtor

Dated: September 9, 2016